

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: PHILIPS RECALLED CPAP,	)	
BI-LEVEL PAP, AND MECHANICAL	)	Master Docket: Misc. No. 21-1230
VENTILATOR PRODUCTS	)	
LITIGATION,	)	MDL No. 3014
	)	
This Document Relates to: All Actions	)	
Asserting Economic Loss Claims	)	

**NOTICE OF FILING OF AMENDMENT TO CLASS SETTLEMENT AGREEMENT  
AND RELEASE OF ECONOMIC LOSS CLAIMS**

Proposed Settlement Class Representatives, through Plaintiffs’ Co-Lead Counsel and proposed Settlement Class Counsel, hereby file an agreed amendment to the Class Settlement Agreement and Release of Economic Loss Claims (attached hereto as Exhibit “A”). The only change in the amendment, which relates back to the Execution Date of September 7, 2023 and follows comments at yesterday’s case management conference, is to include the following new paragraph at Section 5.3: “The claims that have been asserted against SoClean, Inc. in the *First Consolidated Amended Class Action Complaint and Jury Trial Demand (In re: SoClean, Inc., Marketing, Sales Practices, and Products Liability Litigation, MDL No. 3021 (Docket No. 141))* are not Economic Loss Claims and are not assigned to Philips RS.”

Dated: September 14, 2023

Respectfully submitted,

/s/ Sandra L. Duggan  
Sandra L. Duggan, Esquire  
**LEVIN SEDRAN & BERMAN LLP**  
510 Walnut Street, Suite 500  
Philadelphia, PA 19106  
(215)592-1500 (phone)  
[sduggan@lfsblaw.com](mailto:sduggan@lfsblaw.com)

/s/ Christopher A. Seeger  
Christopher A. Seeger, Esquire  
**SEEGER WEISS LLP**  
55 Challenger Road, 6<sup>th</sup> Floor  
Ridgefield Park, NJ 07660  
(973) 639-9100 (phone)  
[cseeger@seegerweiss.com](mailto:cseeger@seegerweiss.com)

/s/ Steven A. Schwartz

Steven A. Schwartz, Esquire  
**CHIMICLES SCHWARTZ KRINER &  
DONALDSON-SMITH LLP**  
361 West Lancaster Avenue  
Haverford, PA 19041  
(610) 642-8500 (phone)  
[steveschwartz@chimicles.com](mailto:steveschwartz@chimicles.com)

/s/ Kelly K. Iverson

Kelly K. Iverson, Esquire  
**LYNCH CARPENTER, LLP**  
1133 Penn Avenue, 5<sup>th</sup> Floor  
Pittsburgh, PA 15222  
(412) 322-9243 (phone)  
[kelly@lcllp.com](mailto:kelly@lcllp.com)

*Plaintiffs' Co-Lead Counsel / Proposed Settlement Class Counsel*

Roberta D Liebenberg, Esquire (Chair)  
**FINE, KAPLAN AND BLACK, R.P.C.**  
One South Broad Street, 23rd Floor  
Philadelphia, PA 19107  
(215) 567-6565 (phone)  
[rliebenberg@finekaplan.com](mailto:rliebenberg@finekaplan.com)

Lisa Ann Gorshe, Esquire (Vice Chair)  
**JOHNSON BECKER PLLC**  
444 Cedar Street, Ste 1800  
Saint Paul, MN 55101  
(612) 436-1852 (phone)  
[lgorshe@johnsonbecker.com](mailto:lgorshe@johnsonbecker.com)

Arthur H. Stroyd, Jr., Esquire (Vice Chair)  
**DEL SOLE CAVANAUGH STROYD LLC**  
3 PPG Place, Suite 600  
Pittsburgh, PA 15222  
(412) 261-2172 (phone)  
(412) 261-2110 (fax)  
[astroyd@dscslaw.com](mailto:astroyd@dscslaw.com)

*Settlement Committee / Proposed Settlement Class Counsel*

/s/ D. Aaron Rihn

D. Aaron Rihn, Esquire  
**ROBERT PEIRCE & ASSOCIATES,  
P.C.**  
707 Grant Street, Suite 125  
Pittsburgh, PA 15219  
(412) 281-7229 (phone)  
(412) 281-4229 (fax)  
[arihn@peircelaw.com](mailto:arihn@peircelaw.com)

Peter St. Tienne Wolff, Esquire  
**PIETRAGALLO GORDON ALFANO  
BOSICK & RASPANTI, LLP**  
One Oxford Centre - 38th Floor  
Pittsburgh, PA 15219  
(412) 263-2000 (phone)  
(412) 263-2001 (fax)  
[psw@pietragallo.com](mailto:psw@pietragallo.com)

*Plaintiffs' Co-Liaison Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed via the Court's CM/ECF system on this 14th day of September 2023, and will be served to Counsel for Defendants via email.

/s/ D. Aaron Rihn

D. Aaron Rihn, Esquire

PA I.D. No.: 85752

ROBERT PEIRCE & ASSOCIATES, P.C.

707 Grant Street

Suite 125

Pittsburgh, PA 15219

Tel: 412-281-7229

Fax: 412-281-4229

[arihn@peircelaw.com](mailto:arihn@peircelaw.com)